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Attorneys for Defendant  
ROADSAFE TRAFFIC SYSTEMS, INC.

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO**

ADRIANA MAGDALENA RAMOS,  
individually and on behalf of all others similarly  
situated,

Plaintiff,

vs.

ROADSAFE TRAFFIC SYSTEMS, INC.; and  
DOES 1 through 20, inclusive,

Defendant.

Case No. 2:23-CV-02085-KJM-CKD

**JOINT STIPULATION TO  
REMAND; AND ORDER**

Action Filed: 2/8/2023  
Removal Filed: 9/22/23  
Trial Date: None Set

1 Plaintiff Adriana Magdalena Ramos (“Plaintiff”) and Defendant RoadSafe Traffic  
2 Systems, Inc. (“Defendant”) (collectively, the “Parties”), by and through their respective counsel  
3 of record, hereby stipulate, agree as follows:

4 WHEREAS, on February 8, 2023, Plaintiff filed a wage and hour putative class action  
5 complaint against Defendant in the Sacramento County Superior Court.

6 WHEREAS, on September 22, 2023, Defendant removed this case to the District Court  
7 for the Eastern District of California.

8 WHEREAS, on October 23, 2023, Plaintiff filed her Motion to Remand Action to State  
9 Court, on the basis that the amount in controversy did not exceed \$5 million, and remand is  
10 therefore required.

11 WHEREAS, on November 6, 2023, Defendant filed its Opposition to Plaintiff’s Motion  
12 to Remand Action to State Court.

13 WHEREAS, on November 16, 2023, Plaintiff filed her Reply in Support of Motion to  
14 Remand Action to State Court. As of the date of this Joint Stipulation, the Court has yet to rule  
15 on Plaintiff’s Motion to Remand Action to State Court.

16 WHEREAS, on November 27, 2023, pursuant to the Parties’ joint stipulation, the Court  
17 stayed this case and vacated all hearing dates until March 14, 2024, pending the Parties’  
18 mediation.

19 WHEREAS, on January 23, 2024, the Parties attended early private mediation with the  
20 Hon. Carl. J. West (Ret.), a respected mediator in wage and hour class actions. At mediation, the  
21 Parties reached an agreement to settle this Class Action case for less than \$5,000,000.

22 WHEREAS, on February 13, 2024, the Parties fully executed the memorandum of  
23 understanding memorializing the terms of their settlement agreement.

24 WHEREAS, a material term of the Parties’ settlement includes remanding this Class  
25 Action matter to the Sacramento County Superior Court.

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WHEREAS, the Parties have agreed and hereby stipulate that the Action be remanded to the jurisdiction of the Sacramento County Superior Court for all further proceedings.

**IT IS SO STIPULATED.**

Dated: February 16, 2024

**AEGIS LAW FIRM, PC**



By: \_\_\_\_\_  
Jessica L. Campbell  
Alex J. Valle  
Attorneys for Plaintiff Adriana Magdalena Ramos

Dated: February 16, 2024

**OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.**

By: /s/Paul M. Smith  
Michael J. Nader  
Alexandra Asterlin  
Paul M. Smith  
  
Attorneys for Defendant  
ROADSAFE TRAFFIC SYSTEMS, INC.

**ORDER**

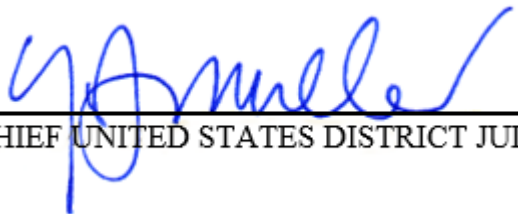
**THIS COURT**, having read and considered the Joint Stipulation to Remand among and between plaintiff ADRIANA MAGDALENA RAMOS and defendant ROADSAFE TRAFFIC SYSTEMS, INC., and finding good cause therefor, orders as follows:

1. This action is remanded in its entirety to the Sacramento County Superior Court.

2. All other dates currently pending and/or scheduled in this action are vacated.

**IT IS SO ORDERED.**

DATED: February 22, 2024.

  
CHIEF UNITED STATES DISTRICT JUDGE